

STATE OF WISCONSIN
COUNTY OF MARQUETTE

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AFFIDAVIT

BEFORE ME, the undersigned authority, on this day personally appeared Abdulrahman Odeh, who, after being by me duly sworn, upon oath said:

My name is Abdulrahman Odeh. I am one of the defendants in the Holy Land Foundation case. I am over the age of 18 and competent to make this affidavit. This affidavit is to set out my recollection of the events surrounding the plea bargain offer I received from the government.

I received several plea bargain offers from the government that my lawyer, Greg Westfall, conveyed to me. My understanding of the plea bargain offers was that I would not plead to any charge in the indictment. Rather, I would plead to a charge of structuring bank deposits. The plea bargain offers were for various amounts of time to be served in prison. They started at 5 years and went down from there.

The following is what my attorney told me about the government's plea bargain offer:

I was told by my attorney that if I accepted the plea agreement, the government would be allowed to inform the jury in the trial of the other defendants that I had pled guilty but not that I had pled guilty to charges other than those in the indictment. I was told by my attorney that the government would be able to use this to the detriment of the other defendants in the indictment by implying that I admitted to guilt of the charges in the indictment, even though this would not be correct.

My attorney also told me that there would be a gag order, where neither I or my attorney could tell anybody what I actually pled guilty to and that it was not to the charges in the indictment and that this would allow the public to be misled by the government as to what I pled to.

I was told by my attorney that if I pled guilty, even to charges not in the indictment, that it would hurt the other defendants. This was true, according to my attorney, because there was evidence of good things I had done during my work for the Holy Land Foundation that the jury would not be allowed to hear if I pled guilty and was not a defendant in the trial. I was told that in this way my plea would hurt the other defendants.

My attorney told me that if I pled guilty, even to charges not in the indictment, it would hurt the other defendants and that if I went to trial it would help the other defendants.

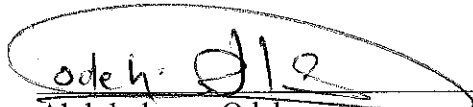
Based on this information from my attorney, I turned down this favorable plea offer from the government. If my attorney had not told me these things, I would have accepted the plea agreement.


Abdulrahman Odeh

DECLARATION OF APPLICANT


I, Abdulrahman Odeh, BOP No. 26548-050, being presently incarcerated in the Federal Correctional Institution, declare under penalty of perjury that according to my belief the foregoing information and allegations contained in this memorandum are true and correct.

Executed on November, 18th, 2013.


Abdulrahman Odeh

State of Wisconsin/County of Adams

This document was signed before me on November 18, 2013,
by Odeh Abdulrahman, Reg. number 26548-050.

 Paul Zills, Notary Public
My commission expires on March 22, 2015.